



BellSouth Telecommunications, Inc.

333 Commerce Street
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Nashville, TN 37201-3300

guy.hicks@bellsouth.com

November 29, 2000

Guy M. Hicks
General Counsel
615 214-6301
Fax 615 214-7406

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Petition of Sprint Communications Company L.P. for Arbitration with BellSouth Telecommunications, Inc. Pursuant to Section 252(b) of the Telecommunications Act of 1996*
Docket No. 00-00691

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth's First Interrogatories and First Request for Production of Documents to Sprint Communications Company, LP. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,

Guy M. Hicks

GMH:ch
Enclosure

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Petition of Sprint Communications Company L.P. for Arbitration with BellSouth Telecommunications, Inc. Pursuant to Section 252(b) of the Telecommunications Act of 1996*

Docket No. 00-00691

**BELLSOUTH TELECOMMUNICATIONS, INC.'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS TO SPRINT COMMUNICATIONS COMPANY, LP**

BellSouth Telecommunications, Inc. ("BellSouth") hereby requests Sprint Communications Company, LP ("Sprint") to provide responses to the following Requests for Production by December 15, 2000.

INSTRUCTIONS

(a) If any response required by way of answer to these Requests for Production is considered to contain confidential or protected information, please furnish this information subject to a protective agreement.

(b) If any document is withheld under a claim of privilege, please furnish a list of each document for which the privilege is claimed, reflecting the name and address of the person who prepared the document, the date the document was prepared, each person who was sent a copy of the document, each person who has viewed or who has had custody of a copy of the document, and a statement of the basis on which the privilege was claimed.

(c) These Requests for Production are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These Requests for Production are intended to include requests for information that is physically within

Sprint's possession, custody or control as well as in the possession, custody or control of Sprint's agents, attorneys, or other third parties from which such documents may be obtained.

(d) If any Request for Production cannot be responded in full, answer to the extent possible and specify the reason for your inability to respond fully. If you object to any part of a Request for Production, answer all parts of the request to which you do not object, and as to each part to which you do object, separately set forth this specific basis for the objection.

(e) These Requests for Production are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these requests subsequently become known or should your initial response be incorrect or untrue.

DEFINITIONS

(a) "Sprint" means Sprint Communications Company, LP, any predecessors in interest, its parent, subsidiaries, and affiliates their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of Sprint.

(b) "You" and "your" refer to Sprint.

(c) "Arbitration" refers to the Petition for Arbitration filed with the Tennessee Regulatory Authority on August 7, 2000 in Docket No. 00-00691 by Sprint Communications Company, LP against BellSouth Telecommunications, Inc.

(d) "Person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

REQUESTS FOR PRODUCTION

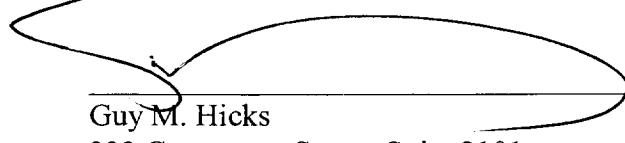
1. Produce every document identified in Sprint's responses to BellSouth's interrogatories.
2. Produce all documents referring, relating or pertaining to the payment to or by Sprint or any other ILEC or CLEC of reciprocal compensation for ISP-bound traffic. To be perfectly clear, BellSouth believes that Sprint has memoranda in which its employees

discuss whether payment of reciprocal compensation for ISP traffic is required or appropriate.

3. Produce all documents referring, relating or pertaining to telephone-to-telephone voice calls delivered over IP Telephony.
4. Produce all documents referring or relating to forecasted growth of Sprint's local market in Tennessee over the next 24 months.
5. Produce all documents referring or relating to historical growth of Sprint's local market in Tennessee over the past 24 months.
6. Produce all documents referring, relating or pertaining to any agreements to which Sprint is a party that involves the sharing of any reciprocal compensation received by Sprint from BellSouth.
7. Produce all documents referring, relating or pertaining to any ownership or interest Sprint has in an ISP in Tennessee.
8. Produce all documents referring, relating or pertaining to any agreements to which Sprint is a party that set forth any compensation arrangements with any other ILEC or CLEC regarding IP Telephony.
9. Produce any document relied upon by Sprint in preparing any answer to any Interrogatory in this proceeding.
10. Please provide any and all documents that relate, in any way, to any of the issues set forth in the Joint Positions Matrix filed by the Parties on November 17, 2000.

Respectfully submitted, this 30th day of November 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.



Guy M. Hicks
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(615) 214-6301

R. DOUGLAS LACKEY
E. EARL EDENFIELD JR.
675 West Peachtree Street, Suite 4300
Atlanta, Georgia 30375

CERTIFICATE OF SERVICE

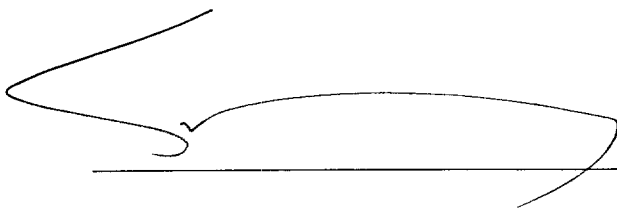
I hereby certify that on November ³⁰~~29~~, 2000, a copy of the foregoing document was served on the parties of record, via hand delivery or U.S. Mail, postage-prepaid, addressed as follows:

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

James Wright, Esq.
Sprint Communications
14111 Capitol Blvd.
Wake Forest, NC 27587

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

William R. Atkinson, Esq.
Benjamin A. Fincher, Esq.
Sprint Communications
3100 Cumberland Circle
Atlanta, GA 30339



A handwritten signature in black ink, consisting of a large, stylized 'S' or 'W' shape, is written over a horizontal line.

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Petition of Sprint Communications Company L.P. for Arbitration with BellSouth Telecommunications, Inc. Pursuant to Section 252(b) of the Telecommunications Act of 1996*

Docket No. 00-00691

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
FIRST INTERROGATORIES TO SPRINT COMMUNICATIONS COMPANY, LP**

BellSouth Telecommunications, Inc. ("BellSouth") hereby requests Sprint Communications Company, L.P. ("Sprint") to provide answers in response to the following Interrogatories by December 15, 2000.

INSTRUCTIONS

- (a) If any response required by way of answer to these Interrogatories is considered to contain confidential or protected information, please furnish this information subject to a protective agreement.
- (b) If any response required by way of answer to these Interrogatories is withheld under a claim of privilege, please identify the privilege asserted and describe the basis for such assertion.
- (c) These Interrogatories are to be answered with reference to all information in your possession, custody or control or reasonably available to you.
- (d) If any Interrogatory cannot be responded to in full, answer to the extent possible and specify the reason for your inability to respond fully. If you object to any part of an Interrogatory, answer all parts of the Interrogatory to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

(e) These Interrogatories are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these Interrogatories subsequently become known or should your initial response be incorrect or untrue.

DEFINITIONS

(a) "Sprint" means Sprint Communications Company, LP, any predecessors in interest, its parent, subsidiaries, and affiliates their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of Sprint.

(b) "You" and "your" refer to Sprint.

(c) "Person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

(d) "And" and "or" shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction will serve to bring within the scope of these Interrogatories information that would not otherwise be brought within their scope.

(e) "Identification" or "identify" when used in reference to: (i) a natural individual, requires you to state his or her full name and residential and business address; (ii) a corporation, requires you to state its full corporate name and any names under which it does business, the state of incorporation, and the address of its principal place of business; (iii) a document, requires you to state the number of pages and the nature of the document (e.g., a letter or memorandum), its title, its date, the name or names of its authors and recipients, and its present location or custodian; (iv) a communication, requires you, if any part of the communication was written, to identify the document or documents which refer to or evidence the communication, and to the extent that the communication was not written, to identify the persons participating in the communication and to state the date, manner, place, and substance of the communication.

(f) "Arbitration" refers to the Petition for Arbitration filed with the Tennessee Regulatory Authority on August 7, 2000 in Docket No. 00-00691 by Sprint Communications Company, LP against BellSouth Telecommunications, Inc.

INTERROGATORIES

1. Identify all persons participating in the preparation of the answers to these Interrogatories or supplying information used in connection therewith.
2. Identify any and all evaluations, reports, analyses, memoranda or other documents prepared by or for Sprint that directly relate to or concern any specific issue raised by Sprint in its Petition and/or the Joint Positions Matrix filed by the Parties on November 17, 2000.
3. Identify the number of access lines in Tennessee for which Sprint provides local telephone service, separating them between business and residential access lines.
4. Does Sprint own, have an interest in, or is Sprint affiliated in any way with an ISP in Tennessee (other than as a customer)? If so, explain in full the nature of such interest or affiliation and identify all documents that refer or relate to such interest or affiliation.
5. State the actual cost (as an average cost per minute, if calculable) Sprint incurs in transporting ISP traffic from the point of interconnection with BellSouth in Tennessee to the ISP server being served by a Sprint switch. If this information is not available on a per minute basis, state what information is available that relates to this cost. In answering this interrogatory, describe in detail how this cost was calculated and identify all documents referring or relating to such calculation. If Sprint has made no such calculation and has no idea what the cost of transporting ISP traffic in such a manner would be, please so state.
6. Please state the total number of *local* end user customers that Sprint serves within the state of Tennessee, separated into residential and business customers. If Sprint has no further information other than the number of lines provided in response to an earlier request, please say so.
7. State the rate you contend is appropriate for reciprocal compensation for ISP-bound traffic, and separately state the rate you contend is appropriate for local traffic, if that is a different figure. In answering this interrogatory, state with particularity how the rate(s) were calculated and identify any analyses, cost studies, or other reports that support your rates.
8. Does Sprint deliver traffic to ISPs located outside the rate center in which the call to the ISP originated?

9. If the answer to Interrogatory 8 is in the affirmative, describe the network architecture used by Sprint to deliver traffic to ISPs located outside the rate center in which the call to the ISP originated.
10. If the answer to Interrogatory 8 is in the affirmative, state whether or not Sprint collects reciprocal compensation for traffic delivered to ISPs located outside the rate center in which the call to the ISP originated.
11. State the number of resold lines Sprint has in Tennessee, broken down by residence and business lines.
12. State the number of UNEs that Sprint has purchased in Tennessee.
13. Does Sprint contend that if Sprint selects a single point of interconnection in each LATA in Tennessee, or fewer interconnection points than BellSouth has local calling areas in Tennessee, that BellSouth has to transport calls from local calling areas not served by an Sprint point of interconnection to Sprint's nearest point of interconnection with BellSouth's network in the LATA?
14. If the answer to Interrogatory 13 was in the affirmative, how does Sprint contend that BellSouth should recover its costs for transporting traffic from the originating local calling area to the point of Interconnection (POI) in situations in which the POI is outside the originating local calling area?
15. If the answer to Interrogatory 13 was in the affirmative, what legal authority does Sprint rely upon in support of its contention that BellSouth is obligated to incur the costs to haul BellSouth originating traffic from the local calling area where the call originated to the Sprint point of presence outside BellSouth's local calling area?
16. Does Sprint have facilities in place to serve customers in each of BellSouth's local calling areas in Tennessee?
17. Does Sprint currently serve customers in each of BellSouth's local calling areas in Tennessee? If so, identify each such BellSouth local calling area.
18. State the number of switches Sprint has deployed in Tennessee including the location, switch type (including the model and manufacturer), and the date the switch became operational.
19. State whether any of the switches identified in response to Interrogatory 18 are currently providing local switching for Sprint local customers. If so, please identify each such switch by location, switch type (including the model and manufacturer), and the date the switch became operational for purposes of providing local service.

20. Does Sprint contend that any of the switches identified in Interrogatory 18 actually perform local tandem switching functions in Tennessee? If so, please identify each such switch by location, switch type (including the model and manufacturer), and the date the switch began actually performing local tandem switching functions. Also, for each switch identified herein, describe in detail the actual local tandem switching functions being performed by the switch and identify all documents that support Sprint's response.
21. Does Sprint contend that its local switches in the State of Tennessee, if any, serve a comparable geographic area to BellSouth's tandem switch? If the answer to this Interrogatory is in the affirmative, please state all facts and identify all documents that support this contention.
22. For each of the wire centers served by BellSouth's tandem switches in Tennessee, state the total number of customers in each such wire center to which Sprint provides local telephone exchange service.
23. If Sprint contends that any of the switches identified in response to an earlier Interrogatory is capable of providing local service, even if not currently providing such service, state whether any changes in the switch, i.e. software updates, additional hardware modules, would be required in order to actually enable the switches to provide local switching.
24. Does Sprint agree that where an originating carrier, using its own facilities, mixes originating long distance calls and originating local calls that ultimately terminate to an Sprint local customer, that Sprint wants the calls separated and, in such circumstances, Sprint wants to bill any terminating access charges that might be due?
25. Does Sprint agree that in the circumstances described in interrogatory 24 above, Sprint wants BellSouth to bill the originating carrier for the local calls referred to therein?
26. If the answer to interrogatory 25 is not an unqualified affirmative answer, is it correct that Sprint does not want to bill the originating carrier reciprocal compensation charges for terminating the local call to Sprint's customer in the circumstances described in interrogatory 24?
27. Please explain why, when an originating carrier, using its own facilities, sends long distance calls and local calls to Sprint's end users over the same terminating facilities, Sprint wants to bill the terminating access charges, but not charges associated with the local calls.
28. Does Sprint track its own internal performance data at the metropolitan statistical area (MSA) level? If so, provide Sprint's internal performance data for each corresponding performance measurement or SQM Sprint proposes in this proceeding.

29. If Sprint's response to Interrogatory 28 is in the negative, how does Sprint track its own internal performance data and at what level of disaggregation?

Respectfully submitted, this 30th day of November 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

A handwritten signature in black ink, appearing to read "Guy M. Hicks", is written over a horizontal line. The signature is stylized with a large loop and a long horizontal stroke extending to the right.

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(615) 214-6301

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E. EARL EDENFIELD JR.
675 West Peachtree Street, Suite 4300
Atlanta, Georgia 30375

CERTIFICATE OF SERVICE

I hereby certify that on November 29³⁰, 2000, a copy of the foregoing document was served on the parties of record, via hand delivery or U.S. Mail, postage-prepaid, addressed as follows:

- ☐ Hand
- ☒ Mail
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James Wright, Esq.
Sprint Communications
14111 Capitol Blvd.
Wake Forest, NC 27587

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